

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL BOXES
ETC., and JCK INDUSTRIES, INC., on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (JG) (VVP)

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF THE SECOND
ROUND OF SETTLEMENTS AND PLAN OF ALLOCATION**

Christopher Lovell
**LOVELL STEWART HALEBIAN
JACOBSON LLP**
61 Broadway, Suite 501
New York, NY 10006

Steven N. Williams
COTCHETT, PITRE & MCCARTHY
San Francisco Airport Office Center
840 Malcolm Road, Suite 200
Burlingame, CA 94010

W. Joseph Bruckner
**LOCKRIDGE GRINDAL NAUEN
P.L.L.P.**
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401

Daniel E. Gustafson
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402

TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the Court will hold a hearing on November 2, 2015 at 10:00 A.M. at the United States District Court, 225 Cadman Plaza East, Brooklyn, New York, 11201 to consider whether to finally approve the eleven proposed class action settlements and the Plan of Allocation. Please take further notice that the Court may adjourn or continue such hearing to a later date and any such continuances or adjournments will also be posted on www.freightforwardcase.com.

Plaintiffs move the Court for entry of an order finally approving the eleven Proposed Settlements, constituting a cumulative Settlement Fund of \$197,623,497.87.¹ In support of their Motion, Plaintiffs submit a Memorandum of Law, charts outlining the settlement amounts and various recoveries (Exhibits 1-2), the eleven Proposed Settlements (Exhibits 3-13), the proposed Plan of Allocation (Ex. 14), and the Declarations of Katherine Kinsella and Julie Redell. Plaintiffs also submit eleven proposed orders for final approval and judgment, attached to this Notice.

The eleven Proposed Settlements and the Plan of Allocation should be finally approved because the settlements are “fair, reasonable, and adequate.” Fed. R. Civ. P. 23(e). The \$197,623,497.87 Settlement Fund represents an excellent recovery for the Class. No objections to any of the Settlements have been filed or received and only six putative Class Members have opted out. This Court should finally approve the eleven Proposed Settlements.

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¹ This Settlement Fund will increase as a result of assignments the Class received from Settling Defendants’ receipt of settlement money from the litigation, *In re Air Cargo Shipping Services Antitrust Litigation*, No. 06-MD-1775 (JG) (VP) (E.D.N.Y.) (“Air Cargo”).

Dated: October 5, 2015

Respectfully Submitted,

/s/ Steven N. Williams

Steven N. Williams
Adam J. Zapala
COTCHETT, PITRE & McCARTHY, LLP.
San Francisco Airport Office Center
840 Malcolm Road, Ste. 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577
Email: swilliams@cpmlegal.com
azapala@cpmlegal.com

W. Joseph Bruckner
Heidi M. Silton
Craig S. Davis
LOCKRIDGE GRINDAL
NAUEN P.L.L.P.
1000 Washington Avenue South, Suite 2200
Minneapolis MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
Email: wjbruckner@locklaw.com
hmsilton@locklaw.com
csdavis@locklaw.com

Daniel E. Gustafson
Daniel C. Hedlund
Michelle J. Looby
Joshua J. Rissman
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
Email: dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
jrissman@gustafsongluek.com

Christopher Lovell
Benjamin M. Jaccarino
LOVELL STEWART HALEBIAN
JACOBSON LLP
61 Broadway, Suite 501
New York, NY 10006
T: (212) 608-1900
F: (212) 719-4775
E-mail: clovell@lshllp.com
bjaccarino@lshllp.com